

SALLAMONDRA ROBINSON,
INDIVIDUALLY AND AS
PERSONAL REPRESENTATIVE
OF THE ESTATE OF
SHANQUELLA ROBINSON,
DECEASED,

Plaintiff,

v.

DAEJHANAE JACKSON,
ALYSSE HYATT, MALIK DYER,
WENTER DONOVAN,
KHALIL COOKE,
NAZEER TYREE WIGGINS,
UNITED STATES DEPARTMENT
OF STATE, AND THE
FEDERAL BUREAU OF
INVESTIGATION,

Defendants.

I, William L. Harris, declare pursuant to 28 U.S.C. Section 1746:

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2. The statements contained in this Declaration are based upon my personal knowledge, review and consideration of documents available to me in my official capacity, and on information obtained from other FBI employees.

3. I previously submitted a Declaration in this matter attesting that a search of the FBI's Central Records System (CRS) as of December 16, 2024, for any claim submitted to the FBI on behalf of plaintiff Sallamondra Robinson resulted in location of a letter to the FBI entitled "October 25, 2024 Notice of Intent to Sue Federal Bureau of Investigation," together with the envelope in which it was received, date-stamped November 4, 2024 (attached to my prior Declaration as Exhibit A).

4. A subsequent search of the FBI's CRS as of May 5, 2025, for any claim submitted to the FBI on behalf of plaintiff Sallamondra Robinson resulted in location of two additional letters to the FBI: a letter to the FBI entitled "December 4, 2024 Notice of Intent to Sue Federal Bureau of Investigation," together with the envelope in which it was received in FBI Mail Services and date-stamped December 16, 2024; and a letter to the FBI entitled "December 13, 2024 Notice of Intent to Sue Federal Bureau of Investigation," together with the envelope in which it was received in FBI Mail Services and date-stamped December 27, 2024. True and Correct copies of those letters are attached hereto as Exhibits A and B, respectively.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 6 day of May, 2025.

William L. Harris

William L. Harris
Unit Chief
Discovery Unit II
Office of the General Counsel
Federal Bureau of Investigation

Attachment A



December 4, 2024

Notice of Intent to Sue
Federal Bureau of Investigation

****THIS CORRESPONDENCE IS SENT PURSUANT TO 28 U.S.C. §§ 2671 *et. seq.*, 2401, 2675(a)**

Via Certified Mail Return Receipt: 7016 2070 0001 0828 7191

Federal Bureau of Investigation
935 Pennsylvania Ave NW
Washington, D.C. 20535-0001

RE: Negligence Claim on Behalf of Sallamondra Robinson
Date of Loss: November 2022 - April 2023

To Whom It May Concern,

COMES NOW, the Claimant, Sallamondra Robinson, by and through her undersigned counsel and pursuant to the FTCA, 28 U.S.C. §§ 2671 *et. seq.*, 2401, 2675(a), provides written notice that Sallamondra Robinson seeks to file a tort claims lawsuit for money damages against the Federal Bureau of Investigation and its agents for negligence. The FBI failed to promptly and thoroughly investigate the wrongful death of Shanquella Robinson. Additionally, the FBI failed to return Shanquella Robinson's personal property after it was no longer needed for evidentiary purposes. As a result of the FBI's breach of duty, Sallamondra Robinson suffered economic and emotional injuries. In light of the severe injuries suffered, Sallamondra Robinson will seek economic damages including but not limited to compensatory and consequential damages, in the amount of \$10,000,000.00.

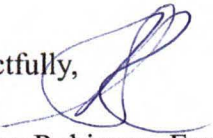
Claimant provides the following information:

Claimant/Our Client: Sallamondra Robinson, personally, and as the

personal representative of the Estate of Shanquella Robinson.

Claimant's Date of Birth: October 21, 1961

Respectfully,


Sue-Ann Robinson, Esq.

Counsel for Plaintiffs

614 S. Federal Highway
Fort Lauderdale, FL 33301

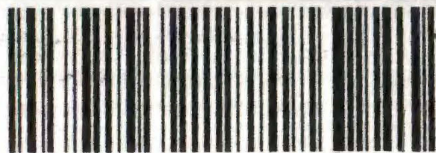


c/o Sue-Ann Robinson, Esq.
Marker Building
614 S. Federal Highway
Ft. Lauderdale, FL 33301

OPENED & INSPECTED

DEC 16 2024

MAIL SERVICES #04



7016 2070 0001 0828 7191

MIAMI

5 DEC

Retail



RDC 99



20535

U.S. POSTAGE PAID
FCM LETTER
FORT LAUDERDALE
FL 33311
DEC 05, 2024

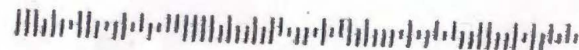
\$9.68

S2324H505401-69

Federal Bureau of Investigation
935 Pennsylvania Ave NW
Washington, D.C. 20535-0001

10140

20535-0001



Attachment B



December 13, 2024

Notice of Intent to Sue
Federal Bureau of Investigation

****THIS CORRESPONDENCE IS SENT PURSUANT TO 28 U.S.C. §§ 2671 *et. seq.*, 2401, 2675(a)**

Via Certified Mail Return Receipt: 7016 2070 0001 0828 6750

December 13, 2024

Federal Bureau of Investigation
935 Pennsylvania Ave NW
Washington, D.C. 20535-0001

RE: Negligence Claim on Behalf of Sallamondra Robinson
Date of Loss: November 2022 - April 2023

To Whom It May Concern,

COMES NOW, the Claimant, Sallamondra Robinson, by and through her undersigned counsel and pursuant to the FTCA, 28 U.S.C. §§ 2671 *et. seq.*, 2401, 2675(a), provides written notice that Sallamondra Robinson seeks to file a tort claims lawsuit for money damages against the Federal Bureau of Investigation and its agents for negligence. The FBI failed to promptly and thoroughly investigate the wrongful death of Shanquella Robinson. Additionally, the FBI failed to return Shanquella Robinson's personal property after it was no longer needed for evidentiary purposes. As a result of the FBI's breach of duty, Sallamondra Robinson suffered economic and emotional injuries. In light of the severe injuries suffered, Sallamondra Robinson will seek economic damages including but not limited to compensatory and consequential damages, in the amount of \$10,000,000.00.

Claimant provides the following information:

Claimant/Our Client: Sallamondra Robinson, personally, and as the
personal representative of the Estate of Shanquella Robinson.
Claimant's Date of Birth: October 21, 1961

Respectfully,

Suc-Ann Robinson, Esq.
Counsel for Plaintiffs
614 S. Federal Highway
Fort Lauderdale, FL 33301
Phone: (754) 801-0897
Email: sucann@frontlinefirm.com

CLIENT STATEMENT OF AUTHORIZATION

This statement is submitted to authorize my counsel, Sue-Ann Robinson, to submit the requisite notice to the Federal Bureau of Investigation on my behalf and on the behalf of the Estate of Shanquella Robinson. In support of this request, I state the following:

1. I, Sallamondra Robinson, am the personal representative of the Estate of Shanquella Robinson and the mother of Shanquella Robinson.
2. I currently reside in Charlotte, North Carolina.
3. I have retained the services of Sue-Ann Robinson of Frontline Law, located at 614 S. Federal Highway, Fort Lauderdale, Florida, to represent my legal interests and those of the Estate of Shanquella Robinson.
4. As my legal counsel, I hereby authorize Frontline Law to file the attached notices on my behalf.

This the 12/10/2024 day of December, 2024.

Signed by:



Sallamondra Robinson

Personal Representative of the Estate of Shanquella Robinson



c/o Sue-Ann Robinson, Esq.
Marker Building
614 S. Federal Highway
Ft. Lauderdale, FL 33301



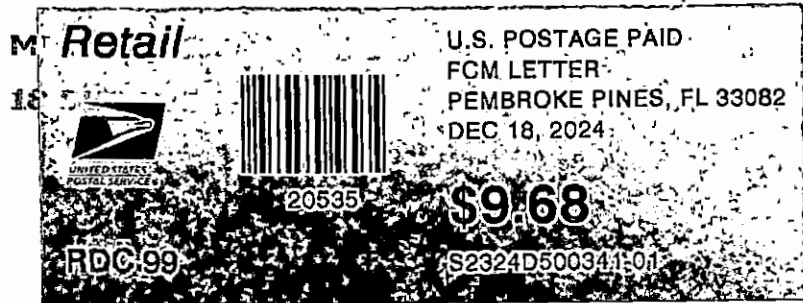
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Federal Bureau of Investigation
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Rn 10140

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20535-0001



Opened & Inspected

DEC 27 2024

Mail Services #32

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